

EXHIBIT B

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Attorneys for Defendants, COUNTY OF SAN BERNARDINO,
ROBERT VACCARI and JAKE ADAMS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JONATHAN WAYNE BOTTEN, SR.;
TANJA DUDEK-BOTTEN;
ANNABELLE BOTTEN; and J.B., a
minor by and through his guardian
JONATHAN WAYNE BOTTEN, SR.,

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; ISAIAH
KEE; MICHAEL BLACWOOD;
BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS;
and DOES 1-10 inclusive,

Defendants.

CASE NO. 5:23-cv-00257-KK-(SHKx)

Assigned for All Purposes to:
Hon. Kenly Kiya Kato– Courtroom #3

**NOTICE OF DEPOSITION OF
ANABELLE BOTTEN**

DATE: November 18, 2024
TIME: 1:00 p.m.
VIA: ZOOM

Complaint filed: February 16, 2023

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil
Procedure Rule 30, counsel for Defendants County of San Bernardino, Robert
Vaccari and Jake Adams in the above-captioned matter will take the oral deposition
of ANABELLE BOTTEN. This deposition is to take place on **November 18, 2024**
at 1:00 p.m. via video conference (ZOOM link attached), before a Certified

1 Shorthand Reporter authorized to administer oaths in the State of California.

2 **NOTICE IS FURTHER GIVEN** that we reserve the right to conduct this
3 deposition utilizing a secure web-based deposition service or telephonically only to
4 provide remote access for those parties wishing to participate in the deposition via
5 the internet and/or the telephone.

6 **PLEASE TAKE FURTHER NOTICE** that the court reporter may also be
7 remote via one of the options above for the purposes of reporting the proceeding and
8 may or may not be in the presence of the deponent.

9 **PLEASE TAKE FURTHER NOTICE** that we also reserve the right to
10 utilize instant visual display technology such that the court reporter's writing of the
11 proceeding or pertinent exhibits will be displayed simultaneous to their writing of
12 the same on one's laptop, iPad, tablet, or other type of display device
13 connected to the court reporter.

14 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Federal Rules of
15 Civil Procedure Rule 30, we reserve the right to record the testimony of this
16 deponent by sound and visual videotape technology for the purpose of using it as
17 admissible evidence at a later proceeding, including trial.

18 If the deponent requires an interpreter, it is requested that you advise this
19 office at least five (5) days prior to the deposition of the language and/or dialect.

20 DATED: October 18, 2024

LYNBERG & WATKINS
A Professional Corporation

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By: /s/ Shannon L. Gustafson
Shannon L. Gustafson
Amy R. Margolies
Anita K. Clarke
Attorneys for Defendants, COUNTY OF
SAN BERNARDINO, ROBERT
VACCARI and JAKE ADAMS

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On October 18, 2024, I served the foregoing document(s) described as **NOTICE OF DEPOSITION OF ANABELLE BOTTEN** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Refer to Service List Below

☒ **BY E-MAIL:** I caused all of the pages of the above-entitled document to be sent to the recipient(s) noted via email at the respective email address(es) indicated above.

☐ **BY FEDERAL EXPRESS/OVERNIGHT MAIL:** I caused the above-described document to be served on the interested parties noted as follows by Federal Express/Overnight Mail.

☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the office(s) of the addressee via messenger.

BY ELECTRONIC TRANSFER via electronic filing service provider and pursuant to *California Rules of Court*, Rule 2.251, sent by e-Service through e-Filing Portal at the time the documents were electronically filed. The service was made on the email addresses listed with the court.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on October 18, 2024, at Orange, California.

/s/ Gloria Pence
Gloria Pence

SERVICE LIST

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Attorney for Plaintiffs,
Jonathan Wayne Botten, Sr.; Tanja
Dudek-Botten; Annabelle Botten;
Jonathan Wayne Botten, Jr. a minor by
and through his Guardian ad Litem
Jonathan Wayne Botten, Sr.

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Bernardo Rubalcava, and State of
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KEE; MICHAEL BLACWOOD;
BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS;
and DOES 1-10 inclusive,

Defendants.

CASE NO. 5:23-cv-00257-KK-(SHKx)

Assigned for All Purposes to:
Hon. Kenly Kiya Kato– Courtroom #3

**SECOND AMENDED NOTICE OF
DEPOSITION OF ANABELLE
BOTTEN**

DATE: December 16, 2024
TIME: 2:00 p.m.
VIA: ZOOM

Complaint filed: February 16, 2023

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil
Procedure Rule 30, counsel for Defendants County of San Bernardino, Robert
Vaccari and Jake Adams in the above-captioned matter will take the oral deposition
of ANABELLE BOTTEN. This deposition is to take place on **December 16, 2024**
at 2:00 p.m. via video conference before a Certified Shorthand Reporter authorized

1 to administer oaths in the State of California.

2 **NOTICE IS FURTHER GIVEN** that we reserve the right to conduct this
3 deposition utilizing a secure web-based deposition service or telephonically only to
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17 admissible evidence at a later proceeding, including trial.

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19 office at least five (5) days prior to the deposition of the language and/or dialect.

20 DATED: December 10, 2024

LYNBERG & WATKINS
A Professional Corporation

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22
23 By: /s/ Shannon L. Gustafson
24 Shannon L. Gustafson
25 Amy R. Margolies
26 Anita K. Clarke
27 Attorneys for Defendants, COUNTY OF
28 SAN BERNARDINO, ROBERT
VACCARI and JAKE ADAMS

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On December 10, 2024, I served the foregoing document(s) described as **AMENDED NOTICE OF DEPOSITION OF ANABELLE BOTTEN** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Refer to Service List Below

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I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on December 10, 2024, at Orange, California.

/s/ Gloria Pence

Gloria Pence

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Attorney for Plaintiffs,
Jonathan Wayne Botten, Sr.; Tanja
Dudek-Botten; Annabelle Botten;
Jonathan Wayne Botten, Jr. a minor by
and through his Guardian ad Litem
Jonathan Wayne Botten, Sr.

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